

FILED

2019 JUL 16 PM 3:00

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARQUEL EVANS, AKA BANG,  
AKA BANG2XS, AKA QUEL,  
JJUAN HAMILTON, AKA DRAMA,  
BRIANNA BERNARD,

Defendants.

INDICTMENT

CASE NO. **1:19 CR 424**

Title 18, United States Code,  
Sections 2, 922(g)(1), 924(a)(2),  
and (c)(1)(A); Title 21, United  
States Code, Sections 841(a)(1)  
and (b)(1)(C)

**JUDGE POLSTER**

COUNT 1

(Felon in Possession of Firearms and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury charges:

1. On or about November 19, 2018, in the Northern District of Ohio, Eastern Division, Defendant MARQUEL EVANS, AKA BANG, AKA BANG2XS, AKA QUEL, possessed firearms and ammunition to wit: a Springfield, .40 caliber pistol, serial number US498288, a Glock, Model 27, .40 caliber pistol, serial number BDWM999, and a Taurus, 9mm pistol, serial number TLP38898, and ammunition having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that is: Trafficking in Cocaine, on or about November 10, 2016, in the Ashtabula County, Ohio, Court of Common Pleas, Case Number 2016 CR 384, and did so knowingly, said firearms and ammunition having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 2

(Distribution of Fentanyl, 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

2. On or about February 11, 2019, in the Northern District of Ohio, Eastern Division, Defendants BRIANNA BERNARD and MARQUEL EVANS, AKA BANG, AKA BANG2XS, AKA QUEL, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 3

(Distribution of Methamphetamine, 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

3. On or about February 11, 2019, in the Northern District of Ohio, Eastern Division, Defendants BRIANNA BERNARD and MARQUEL EVANS, AKA BANG, AKA BANG2XS, AKA QUEL, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 4

(Distribution of Carfentanil, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

4. On or about April 16, 2019, in the Northern District of Ohio, Eastern Division, Defendant JJUAN HAMILTON, AKA DRAMA, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of carfentanil, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 5

(Distribution of Carfentanil, 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

5. On or about April 24, 2019, in the Northern District of Ohio, Eastern Division, Defendants MARQUEL EVANS, AKA BANG, AKA BANG2XS, AKA QUEL, and JJUAN HAMILTON, AKA DRAMA, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of carfentanil, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 6

(Distribution of Carfentanil, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

6. On or about April 25, 2019, in the Northern District of Ohio, Eastern Division, Defendant JJUAN HAMILTON, AKA DRAMA, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of carfentanil, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE: 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)

The Grand Jury further charges:

7. The allegations contained in Count 1 are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c). As a result of this offense, Defendant MARQUEL EVANS, AKA BANG, AKA BANG2XS, AKA QUEL, shall forfeit to the United States any and all firearms and

ammunition involved in or used in the commission of the offense; including, but not limited to, the following:

- a.) Springfield .40 caliber pistol, serial number: US498288, with any ammunition.
- b.) Glock Model 27 .40 caliber pistol, serial number: BDWM999, with any ammunition.
- c.) Taurus 9mm pistol, serial number: TLP38898, with any ammunition.

FORFEITURE: 21 U.S.C. § 853

The Grand Jury further charges:

8. The allegations contained in Counts 2-6 are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853. As a result of these offenses, Defendants MARQUEL EVANS, AKA BANG, AKA BANG2XS, AKA QUEL, JJUAN HAMILTON, AKA DRAMA, and BRIANNA BERNARD shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such offenses; and, any and all of their property used - or intended to be used - in any manner or part, to commit or to facilitate the commission of such offenses.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.